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13 *Attorneys for Plaintiffs and the*
14 *the Proposed Class*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION

18 IN RE SEAGATE TECHNOLOGY LLC
19 LITIGATION

No. 3:16-cv-00523-JCS

20 DECLARATION OF STEVE W.
BERMAN IN SUPPORT OF
21 PLAINTIFFS' SUPPLEMENTAL BRIEF
IN FURTHER SUPPORT OF CLASS
CERTIFICATION

22 DATE: April 27, 2018
23 TIME: 9:30 a.m.
DEPT: Hon. Joseph C. Spero
24 Courtroom G, 15th Floor

1 I, STEVE W. BERMAN, declare as follows:

2 1. I am the managing partner of the law firm Hagens Berman Sobol Shapiro LLP,
3 attorneys for plaintiffs in the above-titled action. I have personal knowledge of the matters stated
4 herein and, if called upon, I could and would competently testify thereto.

5 2. During discovery conferences held between attorneys from Hagens Berman and
6 attorneys for Seagate, Seagate disclosed that it continues to withhold “no more than 2,000”
7 documents. It informed plaintiffs that “nearly every document” yet to be produced will be
8 responsive to plaintiffs’ first set of requests for production, served in June 2016. Seagate stated that
9 approximately 1,000 of these documents are spreadsheets where it is undertaking the “laborious”
10 project of redacting customers’ contact information. Seagate could not or would not articulate the
11 contents of the remaining 1,000 documents that have not yet been produced. Prior to the production
12 in early April 2018, Seagate had not made a substantive document production to plaintiffs for three
13 months.

14 3. Attached hereto are true and correct copies of the following exhibits:

15 Exhibit 58: Document Bates-numbered FED_SEAG0072832-89, produced in the above-
16 captioned litigation and designated “CONFIDENTIAL” by Defendant
Seagate pursuant to the protective order in this action;

17 Exhibit 59: Document Bates-numbered FED_SEAG0072642-651, produced in the
18 above-captioned litigation and designated “CONFIDENTIAL” by Defendant
Seagate pursuant to the protective order in this action;

19 Exhibit 60: Document Bates-numbered FED_SEAG0072362, produced in the above-
20 captioned litigation and designated “CONFIDENTIAL” by Defendant
Seagate pursuant to the protective order in this action;

21 Exhibit 61; Document Bates-numbered FED_SEAG0072676-681, produced in the
22 above- captioned litigation and designated “CONFIDENTIAL” by
Defendant Seagate pursuant to the protective order in this action;

23 Exhibit 62; Document Bates-numbered FED_SEAG0072348, produced in the above-
24 captioned litigation and designated “CONFIDENTIAL” by Defendant
Seagate pursuant to the protective order in this action;

25 Exhibit 63; Document Bates-numbered FED_SEAG0071790-1803, produced in the
26 above- captioned litigation and designated “CONFIDENTIAL” by
Defendant Seagate pursuant to the protective order in this action;

27 Exhibit 64; Excerpts from document Bates-numbered FED_SEAG0072073, produced in
28 the above- captioned litigation and designated “CONFIDENTIAL” by
Defendant Seagate pursuant to the protective order in this action;

- 1 Exhibit 65; Document Bates-numbered FED SEAG0072055-2068, produced in the
2 above- captioned litigation and designated “CONFIDENTIAL” by
3 Defendant Seagate pursuant to the protective order in this action;
- 4 Exhibit 66; Document Bates-numbered FED SEAG0071982-86, produced in the above-
5 captioned litigation and designated “CONFIDENTIAL” by Defendant
6 Seagate pursuant to the protective order in this action;
- 7 Exhibit 67; Document Bates-numbered FED SEAG0071996-72006, produced in the
8 above- captioned litigation and designated “CONFIDENTIAL” by
9 Defendant Seagate pursuant to the protective order in this action;
- 10 Exhibit 68; Document Bates-numbered FED SEAG0072351-54, produced in the above-
11 captioned litigation and designated “CONFIDENTIAL” by Defendant
12 Seagate pursuant to the protective order in this action;
- 13 Exhibit 69; Document Bates-numbered FED SEAG0071957-964, produced in the
14 above- captioned litigation and designated “CONFIDENTIAL” by
15 Defendant Seagate pursuant to the protective order in this action;
- 16 Exhibit 70; Document Bates-numbered FED SEAG0072039-2043, produced in the
17 above- captioned litigation and designated “CONFIDENTIAL” by
18 Defendant Seagate pursuant to the protective order in this action; and
- 19 Exhibit 71; Document Bates-numbered FED SEAG0072015-2020, produced in the
20 above- captioned litigation and designated “CONFIDENTIAL” by
21 Defendant Seagate pursuant to the protective order in this action.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct. Executed this 20th day of April, 2018 at Seattle, Washington.

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s/ Steve W. Berman
STEVE W. BERMAN